

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

COLLEEN JULIUS,

Plaintiff,

-v-

DEPARTMENT OF HUMAN RESOURCES  
ADMINISTRATION, CITY OF NEW YORK,

Defendant.

**ECF CASE**

Case No: 08-Civ. 3091 (PKC)

**PLAINTIFF'S RULE 26  
INITIAL DISCLOSURE**

The plaintiff, through the undersigned counsel, submits this disclosure statement pursuant to Federal Rules of Civil Procedure 26 (a) (1). Plaintiff reserves his right to amend and supplement this disclosure as discovery and plaintiff's investigation progresses.

**I. POTENTIAL WITNESSES**

NAME	CONTACT INFORMATION	SUBJECT OF INFORMATION
1. Yousef Fouks	HRA Employee	He is likely to have discoverable information regarding the unlawful and discriminatory practices directed towards Plaintiff.
2. Frank Olton	HRA Employee	He is likely to have discoverable information regarding the unlawful and discriminatory practices directed towards Plaintiff.
3. Michelle Fouks	HRA Employee	She is likely to have discoverable information regarding the unlawful and discriminatory practices directed towards Plaintiff.

4. Stephanie Grant HRA Employee She is likely to have discoverable information regarding the unlawful and discriminatory practices directed towards Plaintiff.

## **II. DOCUMENTS**

Most of the documents and information relevant to Plaintiff's claim are in the possession, custody and control of individuals and entities other than Plaintiff, including but not limited to, the defendants.

<b>Documents</b>	<b>Location</b>
1. Plaintiff's correspondence with the defendant relating to his working conditions and to refute the defendant's claim of unsatisfactory job performance.	Defendant
2. Documents from the NYC Commission on Human Rights' investigative file.	NYC Commission on Human Rights

Plaintiff will make available those non-privileged, relevant documents that are in her possession, custody or control that tends to support Plaintiff's position in this case. In particular, the plaintiff will make available the following general categories of documents:

## **III. DAMAGES**

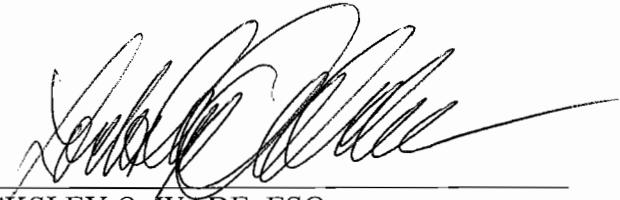
Plaintiff seeks all actual, statutory, direct, consequential, and incidental damages, the precise amounts of which are subject to proof at trial. Plaintiff is also entitled to back-pay, front-pay, monetary loss of employment health benefits, exemplary and civil penalties as applicable for the causes of action, pre and post-judgment interest, reasonable attorney's fees, expert

witness fees and other costs, and any other further relief as the Court deems just and proper. Plaintiffs reserve the right to supplement the types of damages sought prior to trial based on discovery.

Damages may be the subject of expert testimony. Plaintiff has not yet retained an expert on damages and is therefore not in possession of such an expert's damage analysis.

Dated: New York, New York  
June 13, 2008

Respectfully submitted,

By:   
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